

**Qwest**

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**Cronan O'Connell**

Vice President-Federal Regulatory

December 20, 2002

**EX PARTE**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Portals II  
445 12<sup>th</sup> Street, S.W., TW-A325  
Washington, DC 20554

RE: In the Matter of Revision of the Commission's Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102

Dear Ms. Dortch:

On December 19, 2002, Cronan O'Connell and Jackie Mines of Qwest met with the Policy Division of the Wireless Telecommunications Bureau regarding wireless E-911 deployment in the Qwest region including implementation of Phase I and Phase II E-911 services, the tariffing process, the testing process and various outstanding issues, as reflected in the attached presentation. Attending for the FCC were Blaise Scinto, Acting Chief of the Policy Division, Patrick Forster, Daniel Grosh, Joel Taubenblatt, and Jennifer Salas.

Additionally, Qwest briefly addressed a recent letter filed by T-Mobile and transmitted to PSAPs in Qwest territory (see attached). As we discussed in the meeting, T-Mobile's request to deploy Phase I over the Phase II interface within the Qwest region requires the wireless carrier previously to have deployed Phase I. Otherwise, as in the case of T-Mobile for a majority of our region, this is a customized solution requiring technical work to be accomplished by the wireless carrier before such a solution can be implemented successfully. Qwest will be filing a written response to the T-Mobile letter and will also file it as a written ex parte with the Wireless Telecommunications Bureau's Policy Division.

In accordance with FCC Rule 1.49(f), this *Ex Parte* letter is being filed electronically via the Electronic Comment Filing System for inclusion in the public record of the above-referenced docket pursuant to FCC Rule 1.1206(b)(2).

Sincerely,

/s/ Cronan O'Connell

cc: Blaise Scinto (bscinto@fcc.gov)  
Patrick Forster (pforster@fcc.gov)  
Daniel Grosh (dgrosh@fcc.gov)  
Joel Taubenblatt (jtaubenb@fcc.gov)  
Jennifer Salas (jsalas@fcc.gov)

Attachments

**Qwest**®



*Spirit of Service*

**Readiness to Support  
Wireless E-911  
Deployment**

**November 19, 2002**

## ***Key Points***

- ❑ Qwest has fully complied with its LEC obligations to ensure network readiness for Phase 1 and Phase II E911 services**
- ❑ Qwest implements all valid Phase 1 and Phase II PSAP Requests according to the FCC's six month deadline**
- ❑ A PSAP is the Qwest customer of record for all 911 services, both wireline as well as wireless**
- ❑ Qwest has tariffs in each state today for E911 services which includes selective routing and Automatic Location Identification (ALI) on a per access line basis**
  - Includes ILECs, CLECs and wireless carriers**

## ***ILEC Deployment Role***

- ❑ ILECs play a pivotal role in the deployment of wireless E-911 Phase I and II Services
- ❑ For Phase II, in particular, Qwest:
  - ❑ Upgraded the ALI databases with the “J-Standard E2” interface
  - ❑ Filed state tariffs for the ALI upgrade
- ❑ Upon a valid Phase II request, Qwest:
  - ❑ Reaches agreement with the PSAP on the data delivery format between the ILEC and PSAP
  - ❑ Enters into contractual arrangement with PSAPs for the provision of such services

## *Status of Qwest Readiness*

- ❑ Qwest Tariff Filings for Phase II ALI Upgrade:
  - ❑ In September 2002, completed the cost studies to support proposed rates for Phase II services
  - ❑ In October and November 2002, filed tariffs throughout the 14 state region
  - ❑ By January 8, 2003, anticipate effective tariffs in 12 of 14 states
    - ❑ Colorado — in negotiation with Commission staff
    - ❑ South Dakota — projected suspension while Commission reviews costs

# *E-911 Phase II Testing*

## ❑ Step 1:

- ❑ Beta Test accomplished between January-June, 2002 to determine technical validity of E2 Plus upgrade

- ❑ El Paso County, CO

- ❑ Currently, PSAP has not submitted valid Phase II request to Qwest

- ❑ PSAP has reverted back to Phase I service

## ❑ Step 2:

- ❑ Valid PSAP requests implemented by Qwest

- ❑ King County, WA and State of MN

## ❑ Step 3:

- ❑ PSAP requires each wireless carrier to test with Qwest prior to live implementation to determine the differences in what is being sent by each carrier to the ALI

- ❑ King County, WA      T-Mobile / Verizon

- ❑ State of MN              T-Mobile / AWS

## ❑ Step 4:

- ❑ PSAP notifies Qwest and wireless carrier when they are ready to go “live”

## *Outstanding Issues*

- ❑ Use of Phase II platforms to deliver Phase I information to a PSAP
- ❑ Testing
- ❑ Cost Recovery
- ❑ PSAP participation in Phase II

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T-Mobile USA, Inc.  
12920 SE 38th Street, Bellevue, WA 98006

December 10, 2002

David Atherton  
Director  
Minnehaha Metro Communications  
500 North Minnesota Avenue  
Sioux Falls, SD 57104

Dear Mr. Atherton:

I am writing to inform you of a new problem T-Mobile has encountered with Qwest's deployment of E911 Phase I requests. Recently Qwest informed T-Mobile that it would not complete delivery of Phase I service over the E2 Plus interface *to any PSAP* in its fourteen state region. This was quite a surprise to T-Mobile, as we have been working with Qwest to establish connectivity for more than a year, and as recently as three months ago Qwest represented to the Federal Communications Commission that it would deploy "the E2 Plus J standard interface manufactured by Intrado" and that this interface "supports NCAS Phase I and II." Qwest also indicated that E2 Plus had been available for testing with carriers since April 2002, and it would be "available for launch" by mid-September.<sup>1</sup>

T-Mobile decided to deploy Phase I with the E2 Plus interface because E2 Plus is essential for Phase II implementation while it also supports Phase I. Accordingly, should you decide to upgrade to Phase II services in the future, deployment now with E2 Plus will eliminate the need for additional, costly and disruptive upgrades to your network equipment. Qwest has never presented T-Mobile with any viable alternative interface that is capable of migration to Phase II service. CellTrace and NCAS "push" over the WALI interface, both of which Qwest has suggested in lieu of E2 Plus, would require you to make and pay for equipment and interface upgrades now, and would then require additional new equipment in order to implement Phase II, unnecessarily squandering scarce resources and causing significant delay. In addition, you could be without service during the changeover from Phase I to Phase II, and very detailed cutover coordination would be required with all parties. CellTrace also is unavailable in a number of Qwest regions because of telephone number shortages (the CellTrace solution requires the use of a huge number of dialable numbers, which is totally unrealistic in our current environment of widespread telephone numbering shortages).

At T-Mobile, we are aware of no technical barrier to deployment of Phase I over the E2 Plus interface, and Qwest has not asserted any. Indeed, T-Mobile and Ameritech have successfully tested delivery of Phase I data via the E2 Plus interface through the

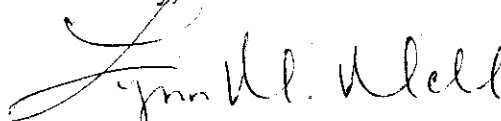
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<sup>1</sup> Letter from Kathryn Marie Krause, Senior Attorney, Qwest, to Marlene H. Dortch, Secretary, FCC, CC Dkt. No. 94-102, filed August 28, 2002.

third party 911 service provider they both use -- Intrado. Instead Qwest has stopped deployment because of a concern about class of service designation. According to Qwest, the E2 Plus interface recognizes a call presented via a pull as either representing Phase II information (and assigns a class of service designation of WPH2), or Phase I "fallback" information (and assigns a class of service designation of WPH1), whereas Qwest presently represents Phase I information delivered for Phase I service as either WRLS, MOBL or Cell, depending on the region served. Qwest has offered no solution to this perceived problem.

T-Mobile has renewed its request to Qwest for immediate deployment and testing of the E2 Plus interface so that we may complete implementation of your request for Phase I service. We firmly believe that Qwest can derive an operational or educational solution to the issue of its designation of class of service, an issue fully within its capability and control. We ask your support in our efforts to work through these problems and deploy your wireless E911 request. Please contact me if you have any questions: [lynn.mell@T-Mobile.com](mailto:lynn.mell@T-Mobile.com) or 425-378-4898.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn H. Mell". The signature is fluid and cursive, with a large initial "L".

Lynn Mell  
Senior Manager, Regulatory Affairs  
T-Mobile, USA, Inc.

Cc: Thomas Sugrue, FCC  
Cronan O'Connell, Qwest